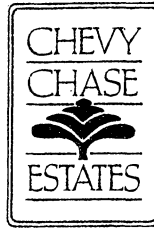
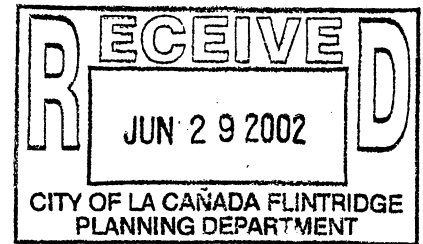


APPENDIX B

**COMMENT LETTERS ON THE INITIAL STUDY /
NOTICE OF PREPARATION**



Chevy Chase Estates Association, Inc.
3021 Hollywell Place, Glendale, California
91206



July 24, 2002

Mr. Fred Buss, Senior Planner
City of La Canada-Flintridge
Community Development Department
1327 Foothill Boulevard
La Canada-Flintridge, CA 91011-2137

Dear Mr. Buss:

RE: Tentative Tract Map 53647
--West/Northwest of Saint Katherine Drive
between Haverstock Road and Palmerstone Drive

I am writing you with regards to the Draft Environmental Checklist Form we received on the above-proposed project.

As you may know, Chevy Chase Estates Association is the homeowners association that is directly adjacent to the proposed project. We believe that some of our member homeowners will likely be impacted by this proposed project and we are concerned about such impacts. Our homeowners association represents those impacted homeowners in Glendale.

We have read the Draft Environmental Checklist Form and do not agree with the evaluation dated July 2, 2002 as follows:

With regards to Item #7, HYDROLOGY AND WATER: we believe that as a result of grading there is a strong potential for "runoffs" and drainage problems impacting the hillsides and adjacent homes and properties including flood hazards and mud flow.

With regards to Item #13, RECREATION: we believe that the potential build-out of the proposed homes would have a material impact on recreation facilities that are currently limited in the area.

Mr. Fred Buss
July 24, 2002
Page Two

With regards to Item #14, TRAFFIC/TRANSPORTATION: we strongly disagree with the evaluation of "no impact" on this item and, specifically, Items # b), c), and g). Chevy Chase Canyon Road is currently a heavily traveled main road and may already be beyond capacity. Any additional traffic as a result of this project would add substantial traffic and thus create safety hazards and risks.

With regards to Item #16, MANDATORY FINDING OF SIGNIFICANCE: we believe that Item # b) is not properly evaluated as "no impact". We believe that the cumulative impact of a number of new large homes would have a significant cumulative impact on water runoff, mud slides, noise and, most importantly, traffic and safety.

Inasmuch as our members will be impacted by this proposed project, we would appreciate being a participant in the consideration of this project. We would appreciate receiving copies of any notices and public hearings on the project. We would also like to present data during the formal EIR hearings and process and the city's consideration of the draft EIR.

I would also appreciate the opportunity to review the city's file on this project at your convenience. I shall call your office in a week to arrange a time to review the file.

Sincerely,



Gerald W. Briggs, President
Chevy Chase Estates Homeowners Association
3021 Hollywell Place
Glendale, California 91206
Tel: (818) 956-7547
Fax: (818) 956-1006



**COUNTY OF LOS ANGELES
DEPARTMENT OF HEALTH SERVICES
Public Health**

THOMAS L. GARTHWAITE, M.D.
DIRECTOR and CHIEF MEDICAL OFFICER

FRED LEAF
CHIEF OPERATING OFFICER

JONATHAN E. FIELDING, M.D., M.P.H.
Director of Public Health and Health Officer

Environmental Health
ARTURO AGUIRRE, Director

Bureau of Environmental Protection
Mountain & Rural/Water, Sewage & Subdivision Program
5050 Commerce Drive, Baldwin Park, CA 91706-1423
TEL (626)430-5380 • FAX (626)813-3016
www.lapublichealth.org/eh/progs/envirp.htm



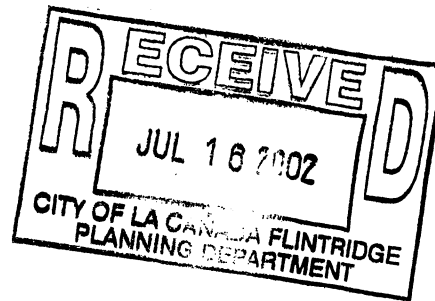
BOARD OF SUPERVISORS
Gloria Molina
First District

Yvonne Brathwaite Burke
Second District

Zev Yaroslavsky
Third District

Don Knabe
Fourth District

Michael D. Antonovich
Fifth District



July 10, 2002

Fred Buss, Senior Planner
City of La Canada Flintridge
Community Development Department
1327 Foothill Boulevard
La Canada Flintridge, CA 91011

RE: Draft Environmental Impact Report; Tentative Tract Map 53647

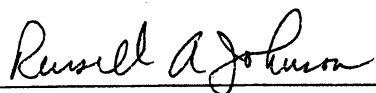
This is in response to Request for Comments for the Preliminary Draft Environmental Impact Report that was forwarded to Mountain & Rural/Water, Sewage & Subdivision Program for review and comments. This Department has reviewed the submitted information and is unable to recommend approval of this project until the following requirements are completed:

1. The feasibility of installing an approved private sewage disposal system shall be satisfactorily demonstrated for each specific lot that will be dependent upon the use of individual on-site sewage disposal system. Submitted information indicates that "most of the site will be served by the sewer district from Pasadena". This procedure shall be completed in accordance with the guidelines established by this Department and other pertinent regulatory agencies to include information regarding septic system, percolation testing for present and future expansion areas, soil profile report and determination of historic high groundwater mark, prepared by qualified and certified professionals to conform to feasibility guidelines (See attached guidance). Private sewage disposal systems shall be in compliance with "Guidelines for Waste Disposal from Land Development, California Regional Water Quality Control Board, (Los Angeles Region)" and Los Angeles County Public Health and Plumbing Codes.
2. The availability of an adequate sustainable supply of potable water from an approved source in compliance with the California Safe Drinking Act and the Los Angeles County Code Title 11, Chapter 11:38.130 and 11:38.140 shall be demonstrated for each specific lot. Submitted information indicates that lots 10, 11, 12 and 13 cannot be adequately served by the existing water system due to pressure zone issues.

City of La Canada
Parcel Map 25884
July 10, 2002
Page 2

If you have any questions or need additional information, please contact Patrick Nejadian at 626-430-5380.

Respectfully,

A handwritten signature in cursive script, reading "Russell A. Johnson". The signature is written in dark ink and is positioned above a horizontal line.

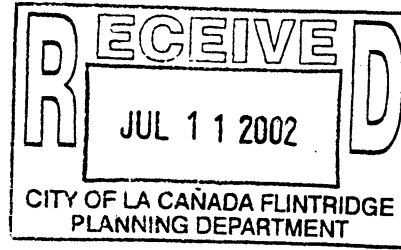
Russell A. Johnson, R.E.H.S., Chief,
Mountain & Rural / Water, Sewage & Subdivision Program

The Gas Company™



July 8, 2002

Mr. Fred Buss, Sr. Planner
LA CANADA FLINTRIDGE
Community Development Dept.
1327 Foothill Blvd.
La Canada Flintridge, CA 91011-2137



**Subject: Agency Response Letter for NOP DEIR for Tent. Tr. No. 53647,
City of La Canada Flintridge, CA 90041 (SCG Atlas No. C14N)**

The Gas Company has reviewed the NOP and anticipates no environmental issues serving this project.

This letter is not to be interpreted as a contractual commitment to serve this proposed project, but only as an information service. Its intent is to notify you that Southern California Gas Company has adequate capacity and facilities in the area where this project is proposed. Gas service can be provided **without** significant impact on the environment from various existing **medium pressure mains in surrounding streets.**

Service would be in accordance with our policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made. The availability of natural gas service, as set forth in this letter, is based on present conditions of gas supply and regulatory policies. As a public utility, Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. We can also be affected by actions of federal regulatory agencies. Should these agencies take any action which affects gas supply or the condition under which service is available, gas service will be provided in accordance with the revised conditions. This letter is also provided without considering any conditions or non-utility laws and regulations (such as environmental regulations) which could affect actual construction of a main or service line extension (for example, if hazardous wastes were encountered in the process of installing the line). Those, of course, can only be determined around the time contractual arrangements are made and construction is begun.

When each project has final approval, please contact our New Business Project Manager, Mr. Terry Kappen, at (323) 881-3586. It may require up to 90 days to process your application for the installation of gas lines in your project.

Sincerely,

Jim Hammel

Technical Services, Northern Region
818-701-3320
FAX: 818-701-3380

cc: T. Kappen, NBPM, Glendale District
B. Huleis, Environmental Compliance
City Correspondence File

**Southern California
Gas Company**

9400 Oakdale Avenue
Chatsworth, CA
91313-2300

Mailing Address:
Box 2300
Chatsworth, CA
91313-2300



CITY OF GLENDALE, CALIFORNIA
Planning Division

633 East Broadway, Room 103
Glendale, California 91206-4385
(818) 548-2140 (818) 548-2144
(818) 548-2115 Fax (818) 240-0392
www.ci.glendale.ca.us

August 1, 2002

Mr. Fred Buss, Senior Planner
City of La Canada-Flintridge
Community Development Department
1327 Foothill Boulevard
La Canada-Flintridge, CA 91011-2137

**RE: Tentative Tract Map No. 53647
West/Northwest of Saint Katherine Drive between Haverstock Road and
Palmerstone Drive**

Dear Mr. Buss:

Thank you for sending the City of Glendale the Notice of Preparation for the above referenced project. Upon review, the City agrees that an Environmental Impact Report (EIR) needs to be prepared. For your consideration the City of Glendale would request that additional analysis be prepared for the following:

1. A view-shed analysis should be considered from Paseo De Cima in the City of Glendale for potential visual impacts.
2. Traffic analysis related to the City of Glendale, especially at Figueroa Street and Chevy Chase Canyon Road due to their direct proximity to the proposed project.

Again, the City thanks you for the opportunity to inform you of our views for the scope and content of the environmental information needed to prepare the Environmental Impact Report (EIR). Please contact me at (818) 548-2140 Lstotler@ci.glendale.ca.us for all correspondence related to this project.

Sincerely,

A handwritten signature in cursive script, reading "Laura Stotler".

Laura Stotler, AICP
Principal Planner

Cc: Elaine Wilkerson, Director of Planning

LS:ka

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



July 19, 2002

Fred Buss
City of La Canada Flintridge
1327 Foothill Boulevard
La Canada Flintridge, CA 91011-2137

RE: SCH# 2002071028 – Tentative Tract Map 53647, La Canada Flintridge, Los Angeles County

Dear Mr. Buss:

The Native American Heritage Commission has reviewed the Notice of Preparation (NOP) regarding the above project. To adequately assess and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

- ✓ Contact the appropriate Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check.
 - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures.
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

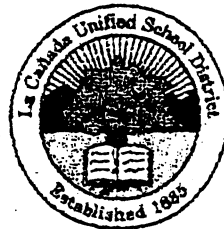
Sincerely,

Rob Wood
Environmental Specialist III
(916) 653-4040

CC: State Clearinghouse

La Cañada Unified School District

...a learning community committed to personal growth
and academic excellence



Leabo
erim Superintendent
sistant Superintendent, Human Resources

mes Stratton
sistant Superintendent
rriculum & Instruction

October 17, 2001

Maria Delgadillo
Spindler Engineering Corporation
16823 Saticoy St.
Van Nuys, CA 91406

Re: Job # 3679.00 File 2-18-03

The proposed Vesting Tentative Tract of 18 single-family homes is within the boundaries of La Canada Unified School District and will be served by La Canada Elementary School for grades Kindergarten through 6th grade and by La Canada High School for grades 7 through 12. Home-to-school transportation is not provided by the district.

The school district requires developer fees to mitigate student growth and thus will be able to handle the new students from these proposed new homes.

If you have any further questions, please contact our office at (818) 952-8383.

Sincerely,

John W. Kramar
Assistant Superintendent
Business Services

JWK:kab

August 2, 2002

Mr. Fred Buss, Senior Planner
City of La Canada Flintridge
1327 Foothill Boulevard
La Canada Flintridge, CA 91011

RE: City of La Canada Flintridge Draft Environmental Checklist for Tentative Tract Map 53647 -Kudrave Architects Proposed Development - West/Northwest of Saint Katherine Drive between Haverstock Road and Palmerstone Drive, La Canada Flintridge, CA

Dear Fred:

Thank you for the opportunity to comment on the subject Draft Environmental Checklist for Tentative Tract Map 53647.

As noted on page 2 in the Draft Environmental Checklist, electric distribution infrastructure will be needed in order to accommodate the new development. The enclosed maps from SCE show where current distribution service poles, underground services and other SCE facilities are located. Once SCE receives the specific plans from the project proponent for the homes proposed for this area, we will be able to advise the proponent/ developer regarding the new infrastructure as well as the costs associated with such infrastructure that will be required to meet the projected load requirements for the new homes

Please note that we assume the project proponent will be preparing an Environmental Impact Report (EIR) for this project and should issue a Notice of Preparation for the EIR. Due to the very steep terrain (average slope is 48%) on the project site, SCE would want to make sure that the draft EIR covers any environmental impacts caused by the installation of our facilities to serve the project.

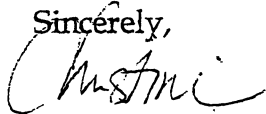
In addition, please note that SCE's Eagle-Rock Arroyo 66-kilovolt transmission line traverses a portion of the southern area of the proposed development. As per the Sub Division Map Act, a preliminary Tract Map for the new development would need to be reviewed by SCE, in order to determine if the proposed

development adversely affects SCE's facilities, and to ensure that proper access and clearances are maintained.

Thank you for the opportunity to comment on the Draft Environmental Checklist. Please feel free to contact me at (626) 303-8419 if you have any questions or need further information.

In addition, please feel free to contact Ms. Leslie Velasquez, SCE's Service Planner for La Canada Flintridge, at (626) 303-8493, who will be the liaison with the developer when the developer is ready to submit plans for the local distribution service required for the new homes. We strongly urge the project proponent get in touch with Ms. Velasquez as soon as possible (e.g., prior to the project construction plans being finalized on this project).

Sincerely,



Christine McLeod
Public Affairs Region Manager

Cc: Tracey Alsobrook, SCE Environmental Affairs
Arlan Averyt, SCE T&D Facilities Mapping
Don Bellis/Steve Alford, SCE Corporate Real Estate
Larry Benjamin, SCE Transmission
Victor Peraza, SCE Monrovia Service Center
Leslie Velasquez, SCE Monrovia Service Center

Enclosures

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and hydrants.

This property is located within the area described by the Forester and Fire Warden as a Fire Zone 4, Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans must be met.

Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.

Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all weather surface of not less than the prescribed width, unobstructed, clear-to-sky. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

When a bridge is required to be used as part of a fire access road, it shall be constructed and maintained in accordance with nationally recognized standards and designed for a live load sufficient to carry a minimum of 75,000 pounds.

The maximum allowable grade shall not exceed 15% except where the topography makes it impractical to keep within such grade, and then an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade including topography difficulties shall be no more than 17%. Grade breaks shall not exceed 10% in ten (10) feet.

When involved with subdivision, Fire Department requirements for access, fire flow and hydrants are addressed during the subdivision tentative map stage.

Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

SINGLE-FAMILY DWELLING UNITS:

Single-family detached homes shall require a fire flow of 1,250 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration.

Fire hydrant spacing shall be 600 feet and shall meet the following requirements:

1. No portion of lot frontage shall be more than 450 feet via vehicular access from a public fire hydrant.
2. No portion of a structure shall be placed on a lot where it exceeds 750 feet via vehicular access from a properly spaced public fire hydrant.
3. When cul-de-sac depth exceeds 450 feet on a residential street, hydrants shall be required at the corner and mid-block.
4. Additional hydrants will be required if hydrant spacing exceeds specified distances.

Fire Department access shall be provided to within 150 feet of all portions of the exterior walls of the first story of any single-unit. If exceeding 150 feet, provide 20 foot, paved width "Private Driveway/Fire Lane" to within 150 feet of all portions of the exterior walls of the unit. Fire Lanes serving 3-4 units shall be increased to 24 feet in width, and if serving five (5) or more units, the Fire Lane shall be increased to 26 feet.

A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs.

Streets or driveways within the development shall be provided with the following:

1. Thirty-six (36) feet in width on all collector streets and those streets where parking is allowed on both sides.
2. For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING – FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
3. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road.
4. A Fire Department approved turning area shall be provided at the end of a driveway of 300 feet or more in length.

LIMITED ACCESS DEVICES (GATES, ETC.):

1. Any single gate used for ingress and egress shall be a minimum of twenty-six (26) feet in width, clear-to-sky.
2. Any gate used for a single direction of travel, used in conjunction with another gate, used for travel in the opposite direction, (split gates) shall have a minimum width of twenty (20) feet each, clear-to-sky.
3. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
4. All limited access devices shall be of a type approved by the Fire Department.
5. Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths and details of the proposed gates.

TRAFFIC CALMING MEASURES:

All proposals for traffic calming measures (speed humps/bumps, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation.

Should any questions arise regarding design and construction, and/or water and access, please contact Inspector Mike McHargue at (323) 890-4243 (E-mail: mmchargu@lacoofd.org).

Mr. Fred Buss

July 30, 2002

Page 4

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Final Environmental Impact Report.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

A handwritten signature in dark ink, appearing to read "David R. Leininger". The signature is fluid and cursive, with the first name "David" being the most prominent.

DAVID R. LEININGER, ACTING CHIEF, FORESTRY DIVISION
PREVENTION BUREAU

DRL:sc



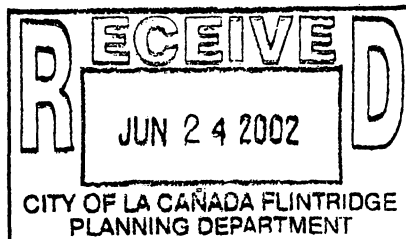
State of California - The Resources Agency

GRAY DAVIS, *Governor*



DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201



July 22, 2002

Mr. Fred Buss
City of La Canada Flintridge
1327 Foothill Blvd.
La Canada Flintridge, CA 91011

**Notice of Preparation of a Draft Environmental Impact Report
for an 18 Lot Subdivision
SCH # 2002071028, Los Angeles County**

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. The proposed project involves the subdivision of 47.11 acres into 18 lots. The proposed project is located on vacant land in the southern portion of the City of La Canada Flintridge.

To enable Department staff to adequately review and comment on the proposed project we recommend the following information, where applicable, be included in the Draft Environmental Impact Report:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
 - a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (Attachment 1).
 - b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.

- c. **Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).**
 - d. **The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.**
- 2. **A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.**
 - a. **CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.**
 - b. **Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic and outdoor artificial lighting.**
 - c. **A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.**
 - d. **Impacts to migratory wildlife affected by the project should be fully evaluated. This can include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.**

- e. Impacts to all habitats from City or County required Fuel Modification Zones.(FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
 - f. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (March 1- August 15) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department recommends a minimum 500 foot buffer for all active raptor nests).
3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, native woodlands, etc. should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
- a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed.
 - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).
 - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless

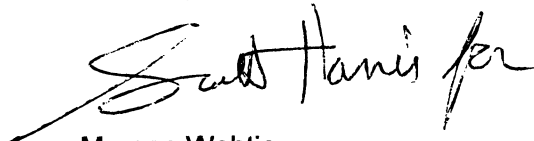
the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:

- a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
 - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
- 5. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.
 - a. The Department requires a streambed agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a stream bed alteration agreement may be a project that is subject to CEQA. To facilitate our issuance of the agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

Mr. Fred Buss
July 22, 2002
Page 5 of 5

The Department suggests a pre-project or early consultation planning meeting for all projects. To make an appointment, please call Scott Harris, Wildlife Biologist, at (818) 360-8140. Thank you for this opportunity to provide comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Harris for", written over the printed name.

Morgan Wehtje
Environmental Scientist IV

Attachments

cc: Mr. Scott Harris
Ms. Mary Meyer
Ms. Betty Courtney
Department of Fish & Game

Mr. Scott Morgan
State Clearinghouse

ATTACHMENT 1

State of California
THE RESOURCES AGENCY
Department of Fish and Game
May 4, 1984

GUIDELINES FOR ASSESSING THE EFFECTS OF PROPOSED DEVELOPMENTS ON RARE AND ENDANGERED PLANTS AND PLANT COMMUNITIES

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted and what information should be contained in the survey report.

1. Botanical surveys that are conducted to determine the environmental effects of a proposed development should be directed to all rare and endangered plants and plant communities. Rare and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare and/or endangered under the following definitions.

A species, subspecies or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition or disease. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare plant communities are those communities that are of highly limited distribution. These communities may or may not contain rare or endangered species. The most current version of the California Natural Diversity Data Base's Outline of Terrestrial Communities in California may be used as a guide to the names of communities.

It is appropriate to conduct a botanical field survey to determine if, or the extent that, rare plants will be affected by a proposed project when:

- a. Based on an initial biological assessment, it appears that the project may damage potential rare plant habitat;
- b. Rare plants have historically been identified on the project site, but adequate information of impact assessment is lacking; or
- c. No initial biological assessment has been conducted and it is unknown whether or not rare plants or their habitat exist on the site.

Botanical consultants should be selected on the basis of possession of the following qualifications (in order of importance):

- a. Experience as a botanical field investigator with experience in field sampling design and field methods;
- b. Taxonomic experience and a knowledge of plant ecology;
- c. Familiarity with the plants of the area, including rare species; and
- d. Familiarity with the appropriate state and federal statutes related to rare plants and plant collecting.

Field surveys should be conducted in a manner that will locate any rare or endangered species that may be present. Specifically, rare or endangered plant surveys should be:

- a. Conducted at the proper time of year when rare or endangered species are both "evident" and identifiable. Field surveys should be scheduled (1) to coincide with known flowering periods, and/or (2) during periods of



Gray Davis
GOVERNOR

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
INTERIM DIRECTOR

Notice of Preparation

July 5, 2002

To: Reviewing Agencies

Re: Tentative Tract Map 53647
SCH# 2002071028

Attached for your review and comment is the Notice of Preparation (NOP) for the Tentative Tract Map 53647 draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Fred Buss
City of La Canada Flintridge
1327 Foothill Boulevard
La Canada Flintridge, CA 91011-2137

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency